

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

STEVEN G. MILLETT,)	
MELODY J. MILLETT,)	
On Behalf Of Themselves and)	
All Others Similarly Situated,)	
Plaintiffs,)	
)	
vs.)	Cause of Action No.: 04-2448-CM
)	
TRANSUNION L.L.C.,)	
Defendant.)	

**JOINT MOTION TO ENLARGE TIME FOR FILING
REPORT OF PARTIES' PLANNING MEETING**

Plaintiffs, Steven G. Millett and Melody J. Millett, and Defendant TransUnion, L.L.C., by and through their undersigned attorneys, file this motion for an enlargement to time to file their report of parties' planning meeting. In support of their motion, the parties state as follows:

1. Plaintiffs brought a class action claim, in Counts I and II of their Complaint, for individuals who are the victims of identity theft. The issues raised by this action involve a unique form of identity theft, the fraudulent use of the social security number of the identity theft victim. The parties have engaged in extensive and frank discussions about the form of relief available for plaintiffs and others similarly situated who are the victims of this form of identity theft. The parties have also engaged in extensive and frank discussions about the feasibility of identifying individuals who are members of the putative class.

2. The parties have consulted extensively concerning case management deadlines. Defendant conveys that until the parties can establish an adequate working definition for the class of individuals who are victims of social security number fraud, it will be difficult, if not impossible, to ascertain how much time would be required to address class certification issues

and class certification discovery. Plaintiffs are interested in continuing the dialogue with Defendant concerning a viable definition of the class for class certification issues. The definition of the class will help frame discovery issues.

3. The parties request that additional time be allowed in order to complete their report of the parties' planning meeting so that discussions concerning class certification can continue.

4. The parties request that the Court conduct its scheduling conference currently set for January 27, 2005. The parties are interested in the Court's input concerning these scheduling issues and the Court's input concerning alternative dispute resolution options available to assist the parties in class definition issues, including the potential for mediation conducted by the court or the appointment of a third party neutral expert. Individuals who will participate in the Scheduling Conference are:

B. Joyce Yeager
Yeager Law Firm, L.L.C.
7270 W. 98th Terrace
Building 7, Suite 220
Overland Park, KS 66212
(913) 648-6673
(913) 648-6921 Facsimile

ATTORNEYS FOR PLAINTIFFS

Amanda Lewis OR
Paul Myers
Strasburger & Price, L.L.C.
2801 Network Blvd., #600
Frisco, TX 75034
(214) 651-4461
(469) 227-6567 Facsimile
amanda.lewis@strasburger.com

ATTORNEY FOR DEFENDANT

5. The parties have engaged in forthcoming and frank discussions and do not make this request for purposes of harassment or delay. The parties believe that, with additional time, their discussions will result in agreement on a viable scheduling order and class definition.

WHEREFORE, the parties jointly and respectfully request an enlargement of time to provide their report of parties' planning meeting and request that the Court hold the Scheduling Conference on January 27, 2005, as scheduled.

RESPECTFULLY SUBMITTED,

Barry R. Grissom #10866
7270 W. 98th Terrace
Building 7, Suite 220
Overland Park, KS 66212
(913) 341-6616
(913) 341-4780-Fax
bgrissom@sprintmail.com

YEAGER LAW FIRM, L.L.C.
By: s/ B. Joyce Yeager
B. Joyce Yeager
Kansas Bar No. 18932
7270 W. 98th Terrace
Building 7, Suite 220
Overland Park, KS 66212
(913) 648-6673
(913) 648-6921 Facsimile
jyeager@joyceyeagerlaw.com

ATTORNEYS FOR PLAINTIFFS

Baker Sterchi Cowden & Rice, L.L.C.
James S. Kreamer
Elizabeth Raines
2400 Peshing Rd., Suite 500
Kansas City, MO 64108-2533
kreamer@bscr-law.com

STRASBURGER & PRICE, L.L.C.

By: s/ Amanda Lewis for
Paul Myers
2801 Network Blvd., #600
Frisco, TX 75034
(214) 651-4461
(469) 227-6567 Facsimile
amanda.lewis@strasburger.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The foregoing was filed electronically and notice is such filing was provided to counsel for the parties pursuant to the Electronic Case Filing Rules of the United States District Court for the District of Kansas on January 20, 2005.

James S. Kreamer
Elizabeth Raines
Baker Sterchi Coweden & Rice, L.L.C.
2400 Pershing Rd., Ste. 500
Kansas City, MO 64108-2533
kreamer@bscr-law.com

and a copy was provided via facsimile to:

Amanda Lewis
Paul Myers
2801 Network Blvd., #600
Frisco, TX 75034
(214) 651-4461
(469) 227-6567 Facsimile

s/ B. Joyce Yeager